

NOV 09 2011

MARY E. D'ANDREA, CLERK
Per _____ Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE SEALED MATTER

CR. NO. 11-MJ-137

MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, moves pursuant to Rule 6 of the Federal Rules of Criminal Procedure to file the documents accompanying this Motion under seal for the reasons set forth in the accompanying sealed declaration in support of the government's motion to seal.

WHEREFORE, for the foregoing reasons, the United States moves to seal this Motion and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

PETER J. SMITH
United States Attorney

/s/ Daryl F. Bloom
DARYL F. BLOOM
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FILED
HARRISBURG, PA

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
UNITED STATES OF AMERICA

MARY E. D'ANDREA, CLERK
Per _____ Deputy Clerk

CR NO. 1:11-MJ-157

v.

UNDER SEAL

RONALD BELCIANO

DECLARATION IN SUPPORT OF MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, submits the following Declaration in Support of the Government's Motion to Seal, pursuant to Rule 6 of the Federal Rules of Criminal Procedure.

1. Your declarant states that, in the view of your declarant this Declaration and the following documents should be filed under seal:

<input type="checkbox"/>	Indictment	<input checked="" type="checkbox"/>	Complaint and Arrest Warrant
<input type="checkbox"/>	Material Witness Warrant, and Affidavit	<input type="checkbox"/>	Search Warrant, Application and Affidavit
<input type="checkbox"/>	Plea Agreement	<input type="checkbox"/>	

2. The United States requests that the above-referenced documents, and this Motion, remain under seal pending:

<input type="checkbox"/>	Further Order of Court; or
<input checked="" type="checkbox"/>	Written notification by the United States that these pleadings no longer need to remain filed under seal; or
<input type="checkbox"/>	_____

3. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

- Preserve the integrity of this ongoing case;
- Ensure the safety of investigative personnel;
- Protect the identity of potential witnesses;
- Allow for the seizure of evidence;
- Permit the arrest of those charged with violations of criminal laws;
- Allow this defendant to complete the cooperation aspects of the plea agreement; or
- Avoid unfair prejudice to the defendants.

WHEREFORE, for the foregoing reasons, the United States moves to seal this Declaration and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

PETER J. SMITH
United States Attorney

/s/ Daryl F. Bloom
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